

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TEXAS STATE LULAC; VOTO LATINO,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	1:21-cv-00546-LY
	§	
BRUCE ELFANT, in his official capacity	§	
as the Travis County Tax Assessor-	§	
Collector; JACQUELYN CALLANEN, in	§	
her official capacity as the Bexar County	§	
Elections Administrator; ISABEL	§	
LONGORIA, in her official capacity as	§	
the Harris County Elections	§	
Administrator; YVONNE RAMON, in	§	
her official capacity as the Hidalgo	§	
County Elections Administrator;	§	
MICHAEL SCARPELLO, in his official	§	
capacity as the Dallas County Elections	§	
Administrator; and LISA WISE, in her	§	
official capacity as El Paso County	§	
Elections Administrator,	§	
<i>Defendants,</i>	§	
	§	
And	§	
	§	
KEN PAXTON, in his official capacity as	§	
Attorney General of Texas; LUPE C.	§	
TORRES, in his official capacity as	§	
Medina County Elections Administrator;	§	
and TERRIE PENDLEY, in her official	§	
capacity as Real County Tax Assessor-	§	
Collector,	§	
<i>Intervenor-Defendants.</i>	§	

**DEFENDANT HARRIS COUNTY ELECTIONS ADMINISTRATOR ISABEL
LONGORIA’S RESPONSE TO PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

Defendant Isabel Longoria (“Defendant Longoria”), in her official capacity as the Harris County Elections Administrator, pursuant to Rule 56 of the Federal Rules of Civil Procedure, the Court’s January 13, 2022 Scheduling Order (Docket No. 102), and the Court’s April 29, 2022

Order extending the dispositive motions deadline (Docket No. 136), respectfully files this response to Plaintiffs' Motion for Summary Judgment and Memorandum of Law in Support (Docket No. 140).

I.

Defendant Longoria hereby adopts and incorporates by reference the response and argument set forth in Defendant Michael Scarpello's, in his official capacity as Dallas Administrator, Response to Plaintiffs' Motion for Summary Judgment (Docket No. 146). The same reasoning and arguments are applicable to Defendant Longoria.

Dated: May 23, 2022

Respectfully submitted,

CHRISTIAN D. MENEFEE
HARRIS COUNTY ATTORNEY

/s/ Tiffany S. Bingham

JONATHAN G.C. FOMBONNE
First Assistant Harris County Attorney
State Bar No. 24102702
Jonathan.Fombonne@harriscountytexas.gov

TIFFANY S. BINGHAM
Managing Counsel
State Bar No. 24012287
Tiffany.Bingham@harriscountytexas.gov

SAMEER S. BIRRING
Assistant County Attorney
State Bar No. 24087169
Sameer.Birring@harriscountytexas.gov

**OFFICE OF THE HARRIS COUNTY
ATTORNEY**

1019 Congress Plaza, 15th Floor
Houston, Texas 77002
Telephone: (713) 274-5101
Facsimile: (713) 755-8924

**ATTORNEYS FOR DEFENDANT
ISABEL LONGORIA, IN HER OFFICIAL
CAPACITY AS HARRIS COUNTY
ELECTIONS ADMINISTRATOR**

CERTIFICATE OF SERVICE

I do hereby certify that, on the 23rd day of May, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which provided electronic service upon all parties.

/s/ Tiffany S. Bingham

TIFFANY S. BINGHAM